

**TECHNICAL GUIDANCE DEVELOPMENT
FOR THE ORDNANCE AND EXPLOSIVES PROGRAM**

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Introduction

This paper provides information on U.S. Army Corps of Engineers (USACE) technical guidance development in support of the USACE Ordnance and Explosives (OE) Program, which in turn supports the Formerly Used Defense Sites component of the Defense Environmental Restoration Program. Headquarters, U.S. Army Corps of Engineers (HQUSACE) has tasked the U.S. Army Engineering and Support Center, Huntsville (USAESCH) OE Mandatory Center of Expertise (MCX) with responsibility for this development. The paper indicates the purpose and scope of the technical guidance development program and discusses the process for technical guidance development, transfer to the field, and implementation. The paper also discusses "lessons learned" relative to technical guidance development. Finally, the paper sets forth key challenges currently facing the technical guidance development program.

Purpose and Scope

The purpose of the technical guidance development program is to provide USACE elements with appropriate technical guidance to ensure that there is a consistency of practices throughout the OE Program, to ensure that roles/responsibilities relative to the OE Program are clearly understood, and to ensure that OE Program quality and safety standards are never compromised.

The scope of the technical guidance development program encompasses the development by the OE MCX of both formal (permanent media) and informal documents. Formal documents

include engineer regulations, engineer pamphlets, engineer manuals, and engineer technical letters. Miscellaneous other formal documents are also developed as tasked by HQUSACE. Informal documents include MCX guidance issued by the OE MCX to clarify existing policies, regulations, etc., or to guide internal USAESCH elements (e.g., the OE Design Center) and interim guidance issued by the OE MCX as prelude to the formal documents listed above. The issuance of interim guidance facilitates the getting of information into the field quickly and provides an opportunity to test the adequacy of the guidance prior to its appearance in final form. Interim guidance documents, whether brief, one-page memorandums or lengthy, comprehensive treatments of given subject-matter areas, are distributed USACE-wide and require ongoing maintenance.

Process

The technical guidance development process is systematic in nature. All guidance development is in accordance with a 5-year plan, which is reviewed regularly and adjusted as appropriate. All aspects of the technical guidance development program, including the 5-year plan, are scrutinized at biannual in-progress reviews involving the OE MCX, HQUSACE, and other relevant entities. The OE MCX coordinates with customers/users throughout the developmental process in order to enhance the adequacy of the final product. The staffing process for formal guidance documents is long, necessitating the development of interim guidance, as discussed above, but also ensuring thoroughness of review for formal guidance prior to its finalization.

To date, the technical guidance development process has produced 19 interim guidance documents. Eleven formal documents are currently under development, two have been published, and one is awaiting HQUSACE signature. Funding for technical guidance development for fiscal years 1998 and 1999 is approximately \$1 million.

Once developed, technical guidance documents are made available via the Internet. HQUSACE provides finalized formal documents at the following address: <http://www.usace.army.mil/inet/usace-docs/>. The OE MCX provides interim guidance documents and supporting quality procedures at the following address: www.hnd.usace.army.mil/oew/policy/regpro.html. The OE MCX provides assistance to the USACE districts in interpreting and

implementing both formal and interim guidance. This assistance is provided in a variety of ways - project site visits, conducting of workshops, etc.

Lessons Learned

The technical guidance development process involves a significant "lessons learned" component. Ideally, the OE MCX develops draft interim guidance, applies the guidance to determine whether or not it is sufficient to meet its intended purpose, then modifies the guidance as necessary to ensure this sufficiency. An example of the process working in ideal fashion can be seen in relation to the long-term monitoring of the Tierrasanta and Murphy Canyon Naval Housing Area project at Tierrasanta, California. When the long-term monitoring guidance developed by the OE MCX was field tested at this project site, a difficulty in executing the review developed due to existing endangered species legislation. Based on this experience, the OE MCX will modify its long-term monitoring guidance, as appropriate, to incorporate environmental-concerns language.

The technical guidance development process does not, of course, always work in ideal fashion. Nevertheless, the principle of "lessons learned" application can and does permeate the entire technical guidance development program. Indication by a customer, for example, that a particular guidance document is difficult to use due to the manner in which certain materials are presented may lead to the modification of that guidance to make it more user friendly, just as any guidance inadequacy problems identified by the Engineering Evaluation/Cost Analysis Review Board will result in new guidance being developed or modification of current guidance to ensure its adequacy.

Challenges

The significant challenges facing the technical guidance development program are multivaried, yet interrelated. They all derive, ultimately, from the fact that technical guidance development must proceed in an environment where fundamental policy issues regarding OE cleanup are not yet decided. Project closeout criteria and an "action limit" for determining whether or not any action is required cannot, for example, be established until the underlying question as to what level of risk is acceptable has been definitively answered. These are,

of course, the kinds of fundamental policy issues which the Range Rule is currently being developed to address.

The overriding challenge facing the technical guidance development program is to participate in the process that will eventuate in definitive resolution of these fundamental policy issues while at the same time providing day-by-day technical guidance that remains within the boundaries of established regulations and reflects "best judgments" of the OE community with respect to these as-yet unresolved issues. The OE MCX is meeting both aspects of this challenge through its ongoing interplay with the OE community, including such activities as participating in Department of the Army and Department of Defense (DOD) working groups with respect to Range Rule development, participating in DOD Integrated Process Teams with respect to a variety of OE issues, and coordinating closely with the U.S. Army Environmental Center to determine what aspects of OE cleanup relative to Base Realignment and Closure and active installations might be applicable to OE cleanup at formerly used defense sites.

Conclusion

This paper has presented information on USACE technical guidance development. The technical guidance development process has been emphasized, with special emphasis being given to the "lessons learned" aspect of the technical guidance development program. Challenges facing the technical guidance development program have been indicated, and the interrelationship of these challenges with fundamental public policy issues relating to OE cleanup has been stressed.